

HERMAN & WHITEAKER, LLC

DONALD L. HERMAN, JR
GREGORY W. WHITEAKER
ROBIN E. TUTTLE[†]
SUSAN C. GOLDHAR ORNSTEIN
SARAH J. ACEVES^{††}

[†]Admitted in DC, SC and FL only
^{††}Admitted in DC only

TEL 202-600-7272
FAX 202-706-6056
3204 TOWER OAKS BLVD, STE 180
ROCKVILLE, MD 20852

June 9, 2014

VIA HAND DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554
Attention: Public Safety and Homeland Security Bureau – Policy and Licensing Division

**Re: Missouri RSA 5 Partnership d/b/a Chariton Valley Wireless Services
AMENDMENT TO SECOND SUPPLEMENT AND AMENDMENT TO
REQUEST FOR WAIVER OF SECTION 20.18(h)(1)(i)(A)
PS Docket No. 07-114**

Dear Secretary Dortch:

Missouri RSA 5 Partnership d/b/a Chariton Valley Wireless Services (“Chariton Valley”), by its attorneys, hereby amends the Second Supplement and Amendment to Request for Waiver of Section 20.18(h)(1)(i)(A) (“Second Supplement”) filed on May 22, 2014, to add as Attachment 6, the confidential version of a letter from the Chariton County Enhanced 911 Services (“Chariton County”) to Chariton Valley indicating Chariton County’s support of Chariton Valley’s transition from its legacy Global System for Mobile Communications (“GSM”) network to its Code Division Multiple Access (“CDMA”) and Long Term Evolution (“LTE”) networks. Chariton Valley also seeks confidential treatment of confidential information in the Chariton County letter, for the reasons set forth in the Request for Confidential Treatment submitted with the Second Supplement.

Attached please find an original and four (4) copies of the Chariton County letter containing confidential information. We are also filing a redacted copy of this letter via ECFS.

Respectfully submitted,



Gregory W. Whiteaker
Counsel for Missouri RSA 5 Partnership d/b/a Chariton Valley Wireless Services

Attachments



CHARITON COUNTY ENHANCED 911 SERVICES
P.O. BOX 15
KEYTESVILLE, MO 65261
660-288-3460



5-16-14

Mr. Jim Simon
Chariton Valley Wireless
1206 North Missouri
Macon, MO 63552

RE: Chariton Valley Transition to Handset-based E911 Solution

Dear Jim:

This letter expresses our continued support for the efforts of Chariton Valley Wireless ("Chariton Valley") to transition its subscribers from its legacy Global System for Mobile Communications ("GSM") network to its Code Division Multiple Access ("CDMA") and Long Term Evolution ("LTE") networks. It is our understanding that Chariton Valley has launched its CDMA and LTE networks, which utilize a handset-based Enhanced 911 ("E911") location accuracy solution. Chariton Valley has informed us that it has transitioned of its wireless subscribers from its GSM network to its CDMA/LTE networks. Chariton Valley also has informed us that it is continuing to transition its remaining GSM customers over to its CDMA/LTE networks, but that additional time is required in order to transition all of Chariton Valley's customers. In addition, Chariton Valley has informed us that, at this point, the complete decommissioning of its legacy GSM network would result in a loss of service – including the loss of 911 service – to GSM subscribers in certain rural areas.

Based on our understanding as set-forth above, we continue to support Chariton Valley's efforts to transition its customers to its CDMA/LTE networks, and look forward to working with Chariton Valley in the future.

Sincerely,

A handwritten signature in black ink that reads "Chris Brown".

Chris Brown
Director
Chariton County E-911